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2 **LEXINGTON LAW GROUP**  
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4 Attorney for Debtor,  
5 TOA, LLC d/b/a The Owners' Advocate

UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF TENNESSEE

9 In re: ) Case No.: 10-01391  
10 )  
11 ) CHAPTER 7  
12 TOA, LLC d/b/a The Owners' Advocate, ) DATE: [No hearing requested]  
13 ) TIME:  
14 ) JUDGE:  
15 ) COURTROOM:  
16 )  
17 )  
18 ) Debtor.)  
19 )

**EXPEDITED MOTION TO WITHDRAW AS COUNSEL FOR DEBTOR**

18 COMES Michael Shemtoub, Esq., pursuant to Local Rule 9075-1 and moves for an  
19 expedited order to withdraw as counsel for Debtor and states as follows:

20           1. On December 11, 2009, the Debtor filed a Chapter 7 bankruptcy case. The first  
21 meeting of creditors set for February 1, 2010.

22        2. On February 1, 2010, Wyndham Vacation Resorts, Inc. (“Wyndham”), a creditor in  
23 the instant bankruptcy case, filed a motion to transfer the case to the Middle District of  
24 Tennessee.

25           3. The motion for change of venue was granted and the case now resides in the Middle  
26           District of Tennessee.

27 4. Debtor's attorney, Michael Shemtoub, is not licensed to practice law in the Middle  
District of Tennessee.

5. Debtor's counsel believes that it is in the best interest of the parties for Debtor's counsel to withdraw as counsel for Debtor.

6. Though Local Rules require a hearing on this matter, Debtor's counsel respectfully requests that this matter be ruled upon without hearing.

7. The Debtor's counsel will give notice to the Chapter 7 Trustee and United States Trustee via the ECF Filing System and give notice to the Debtor and all other parties in interest via First Class United States Mail.

Respectfully submitted:

By: /s/ Michael Shemtoub

Michael Shemtoub

Attorney for Debtor,

TOA, LLC d/b/a The Owners' Advocate

## PROOF OF SERVICE

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 8383 Wilshire Blvd., Suite 702, Beverly Hills, California 90211.

On March, 10 2010, I served the foregoing document described as:

**EXPEDITED MOTION TO WITHDRAW AS COUNSEL FOR DEBTOR**

on the interested parties in this action by placing a true copy thereof addressed as follows:

Honorable Keith M. Lundin  
United States Bankruptcy Court  
Middle District of Tennessee  
701 Broadway, Room 170  
Nashville, TN 37203

TOA, LLC  
3905 State St. Suite 341  
Santa Barbara, CA 93105

Jeanne Burton Gregory  
401 Church St.  
Suite 2220  
Nashville, TN 37219  
Fax: (615)259-3415

Office of the U.S. Trustee  
US Trustee  
701 Broadway, Suite 318  
Nashville, TN 37203-3933

TOA, LLC  
3905 State St Suite 341  
Santa Barbara, CA 93105

Frakenmuth Insurance  
One Mutual Ave  
Frakenmuth, MI 48979-0001

ATT  
P.O. Box 105262  
Atlanta, GA 30348-5362

Gullett Sanford Robinson and Martin PLLC  
ATTN Christopher Cardwell  
315 Deadrick Street  
Suite 1100  
Nashville, TN 37238

ATT  
P.O. Box 105262  
Atlanta, GA 30348-5262

Gullett Sanford Robinson and Martin PLLC  
ATTN Trevor Howell  
315 Deadrick Street  
Suite 1100  
Nashville, TN 37238

COMCAST  
PO Box 105257  
Atlanta, GA 30348-5257

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Humphrey Bros Construction  
PO Box 4501  
Paso Robles, CA 93447

1 Humphrey Bros Construction  
2 PO Box 4501  
2 Paso Robles, CA 93447

NES  
1214 Church Street  
Nashville, TN 37246

3 IRS  
4 IRS OGDEN UT  
4 Washington, DC 84201-0039

NES  
1214 Church Street  
Nashville, TN 37246

5 NES  
6 1214 Chruch Street  
6 Nashville, TN 37246

7 The Bacon Group, LLC  
7 7978 Coley Davis Road  
7 Nashville, TN 37221

8 NES  
8 1214 Church Street  
9 Nashville, TN 37246

Wyndham Vacation Resorts, Inc.  
8427 South Park Circle  
Orlando, FL 32819

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11 [X] **(BY MAIL)** I caused such envelope with postage thereon fully prepaid to be placed in the  
12 United States Mail at Beverly Hills, California.

13 [ ] **(BY OVERNIGHT SERVICE)** I caused said envelope(s) with overnight charges prepaid to be  
14 placed in the Federal ExpressBox or United States Mail (Express Mail) at  
Glendale, California.

15 [ ] **(BY FAX)** I caused a true and correct copy to be transmitted by facsimile to the telephone  
numbers set forth above.

16 [ ] **(State)** I declare that under penalty of perjury under the laws of the State of California that  
17 the above is true and correct.

18 [X] **(Federal)** I declare that I am employed in the office of a member of the bar of this Court  
19 at whose direction the service was made.

20 Executed on March 10, 2010, at Beverly Hills, California.

21 /s/ Martha Valencia  
22 Martha Valencia